

# **Statement of Basis**

**Permit to Construct No. P-2008.0078  
Project ID 61969**

**Clay Peak Municipal Solid Waste Landfill  
Payette, Idaho**

**Facility ID 075-00009**

**Final**

**August 24, 2018**  
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**Permit Writer**

The purpose of this Statement of Basis is to satisfy the requirements of IDAPA 58.01.01. et seq, Rules for the Control of Air Pollution in Idaho, for issuing air permits.

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## ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AAC	acceptable ambient concentrations
AACC	acceptable ambient concentrations for carcinogens
Btu	British thermal units
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	continuous emission monitoring systems
cfm	cubic feet per minute
CFR	Code of Federal Regulations
Clay Peak	Clay Peak Municipal Solid Waste Landfill
CMS	continuous monitoring systems
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
COMS	continuous opacity monitoring systems
DEQ	Department of Environmental Quality
EL	screening emission levels
EPA	U.S. Environmental Protection Agency
HAP	hazardous air pollutants
hr/yr	hours per consecutive 12 calendar month period
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometers
lb/hr	pounds per hour
lb/qtr	pound per quarter
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
MMscf	million standard cubic feet
NAAQS	National Ambient Air Quality Standard
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>2</sub>	nitrogen dioxide
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM <sub>2.5</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
scf	standard cubic feet
SCL	significant contribution limits
SIP	State Implementation Plan
SO <sub>2</sub>	sulfur dioxide
SO <sub>x</sub>	sulfur oxides
T/day	tons per calendar day
T/yr	tons per consecutive 12 calendar month period
TAP	toxic air pollutants
U.S.C.	United States Code
VOC	volatile organic compounds

## **FACILITY INFORMATION**

### ***Description***

The Clay Peak Municipal Solid Waste Landfill (Clay Peak) is owned and operated by Payette County. The landfill commenced operations in October 1993. The landfill is a portion of a rural 1,340 acre site of semi-arid mountainous terrain. The landfill has a proposed maximum design capacity of more than 3.0 megagrams. On average, the landfill receives 300 to 550 tons of garbage per day. At Clay Peak, it is estimated that approximately four acres of surface soil is disturbed at any one time during normal operations. This cumulative four acres involves three main activities at the landfill:

- Covering garbage with dirt at the working face of the landfill,
- Surface mining of dirt for use as cover, and
- Aerating compost rows and screening compost.

Water trucks are used to suppress fugitive dust emissions from vehicles driving on unpaved roads at the landfill.

Flares are used at Clay Peak to combust landfill gas. Flares are connected to passively-fed gas collection systems that consist of perforated PVC pipes running directly into the landfill.

Seven flares are located at Cell No. 1. Cell No. 1 reached its waste acceptance capacity at nearly one million tons and was closed in 2010, requiring construction of Cell No. 2. Six flares will be operated at Cell No. 2 (two for 2018, two for 2019, and two for 2020).

Each flare has a solar panel that charges a battery pack. The batteries are used to power an arc which continuously fires at the discharge of the flare. This system ensures that the flares continuously combust the collected landfill gas. The landfill gas flow rates are variable. When there is a sufficient gas flow rate, the arc ignites the gas within the flare.

The landfill gas is composed of approximately 55% methane (CH<sub>4</sub>), 40 % carbon dioxide (CO<sub>2</sub>), 5% nitrogen (N<sub>2</sub>), and a small amount of non-methane organic compounds (NMOC). Within the NMOC are some hazardous air pollutants (HAP) and toxic air pollutants (TAP). A trace amount of hydrogen sulfide (H<sub>2</sub>S) gas is also found in the landfill gas.

### ***Permitting History***

The following information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

December 16, 2008	P-2008.0078, modification to add three flares, permit status (A, but will become S upon issuance of this permit)
February 27, 2004	P-020034, modification to add two flares and continue to operate two previously PTC-exempt flares at Cell No. 1, permit status (S)

### ***Application Scope***

This PTC is for a minor modification at an existing minor facility and Tier I source.

The applicant has proposed to:

- Install and operate six flares to combust landfill gas (LFG) from Cell No. 2.

### ***Application Chronology***

November 28, 2017	DEQ received an application fee.
December 8, 2017	DEQ received an application.

December 20, 2017 – January 4, 2018	DEQ provided an opportunity to request a public comment period on the application and proposed permitting action.
January 5, 2018	DEQ determined that the application was incomplete.
March 14, 2018	DEQ received supplemental information from the applicant.
April 13, 2018	DEQ determined that the application was complete.
May 14, 2018	DEQ made available the draft permit and statement of basis for peer and regional office review.
June 8, 2018	DEQ made available the draft permit and statement of basis for applicant review.
June 25, 2018	DEQ received the permit processing fee.
July 18 – August 20, 2018	DEQ provided a public comment period on the proposed action.
August 24, 2018	DEQ issued the final permit and statement of basis.

## TECHNICAL ANALYSIS

### *Emissions Units and Control Equipment*

**Table 1 EMISSIONS UNIT AND CONTROL EQUIPMENT INFORMATION**

Source	Control Equipment
<u>Municipal Waste Landfill – Cell No. 1</u> Design capacity: 1.07 megagrams (1.2 million tons) Status: Closed 2010	<u>NW 1.1 Landfill Gas Flare</u> Manufacturer: Landfill Services Corp. Model: CF-5 Heat input capacity: 2.16 MMBtu/hr and 33 cfm Fuel: LFG Installation Date: 2001
	<u>NW 1.2 Landfill Gas Flare</u> Manufacturer: Landfill Services Corp. Model: CF-5 Heat input capacity: 2.16 MMBtu/hr and 33 cfm Fuel: LFG Installation Date: 2004
	<u>NE 1.1 Landfill Gas Flare</u> Manufacturer: Landfill Services Corp. Model: CF-5 Heat input capacity: 2.16 MMBtu/hr and 33 cfm Fuel: LFG Installation Date: 2001
	<u>NE 1.2 Landfill Gas Flare</u> Manufacturer: Landfill Services Corp. Model: CF-5 Heat input capacity: 2.16 MMBtu/hr and 33 cfm Fuel: LFG Manufacture Date: 2005
	<u>SW 1.1 Landfill Gas Flare</u> Manufacturer: Landfill Services Corp. Model: CF-5 Heat input capacity: 2.16 MMBtu/hr and 33 cfm Fuel: LFG Manufacture Date: 2007

Table 1 (continued)

Source	Control Equipment
Municipal Waste Landfill – Cell No. 1 Design capacity: 1.07 megagrams (1.2 million tons) Status: Closed 2010	<u>SE 1.1 Landfill Gas Flare</u> Manufacturer: Landfill Services Corp. Model: CF-5 Heat input capacity: 2.16 MMBtu/hr and 33 cfm Fuel: LFG Manufacture Date: 2007
	<u>SE 1.2 Landfill Gas Flare</u> Manufacturer: Landfill Services Corp. Model: CF-5 Heat input capacity: 2.16 MMBtu/hr and 33 cfm Fuel: LFG Manufacture Date: 2008
<u>Municipal Waste Landfill – Cell No. 2</u> Design capacity: 2.0 megagrams (2.2 million tons) Status: Active	<u>NW 2.1 Landfill Gas Flare</u> Manufacturer: Landfill Services Corp. Model: CF-5 Heat input capacity: 2.16 MMBtu/hr and 33 cfm Fuel: LFG Installation Date: 2018
	<u>NW 2.2 Landfill Gas Flare</u> Manufacturer: Landfill Services Corp. Model: CF-5 Heat input capacity: 2.16 MMBtu/hr and 33 cfm Fuel: LFG Installation Date: 2019
	<u>NW 2.3 Landfill Gas Flare</u> Manufacturer: Landfill Services Corp. Model: CF-5 Heat input capacity: 2.16 MMBtu/hr and 33 cfm Fuel: LFG Installation Date: 2020
	<u>NE 2.1 Landfill Gas Flare</u> Manufacturer: Landfill Services Corp. Model: CF-5 Heat input capacity: 2.16 MMBtu/hr and 33 cfm Fuel: LFG Installation Date: 2018
	<u>NE 2.2 Landfill Gas Flare</u> Manufacturer: Landfill Services Corp. Model: CF-5 Heat input capacity: 2.16 MMBtu/hr and 33 cfm Fuel: LFG Installation Date: 2019
	<u>NE 2.3 Landfill Gas Flare</u> Manufacturer: Landfill Services Corp. Model: CF-5 Heat input capacity: 2.16 MMBtu/hr and 33 cfm Fuel: LFG Installation Date: 2020

## ***Emission Inventories***

### **Potential to Emit**

IDAPA 58.01.01 defines Potential to Emit as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is state or federally enforceable. Secondary emissions do not count in determining the potential to emit of a facility or stationary source.

Using this definition of Potential to Emit an emission inventory was developed for the LFG-fired flares (see Appendix A) associated with this proposed project. Emissions estimates of criteria pollutant and HAP PTE were based on emission factors from AP-42 Section 2.4-5,<sup>1</sup> LandGEM emission estimating software, and the design capacities of Cell No. 1 and Cell No. 2.

### **Uncontrolled Potential to Emit**

Using the definition of Potential to Emit, uncontrolled Potential to Emit is then defined as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored or processed, shall **not** be treated as part of its design **since** the limitation or the effect it would have on emissions **is not** state or federally enforceable.

The uncontrolled Potential to Emit is used to determine if a facility is a “Synthetic Minor” source of emissions. Synthetic Minor sources are facilities that have an uncontrolled Potential to Emit for regulated air pollutants or HAP above the applicable Major Source threshold without permit limits.

The following table presents the uncontrolled Potential to Emit for regulated air pollutants as submitted by the applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations and the assumptions used to determine emissions for each emissions unit.

**Table 2 UNCONTROLLED POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS <sup>(a)</sup>**

	NMOC / VOC	
	lb/hr	T/yr
Cell No. 1 <sup>(a)</sup>	1.59	7.0
Cell No. 2 <sup>(b)</sup>	2.85	12.5
<b>PTE Totals</b>	<b>4.44</b>	<b>19.5</b>

a) Maximum projected annual non-methane organic carbon (NM OC) emissions, in year 2011.

b) Maximum projected annual non-methane organic carbon (NM OC) emissions, in year 2039 when the expected landfill life is met.

### **Pre-Project Potential to Emit**

Pre-project Potential to Emit is used to establish the change in emissions at a facility as a result of this project.

The following table presents the pre-project potential to emit for all criteria pollutants from all permitted emissions units at the facility as submitted by the applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

<sup>1</sup> Compilation of Air Pollutant Emission Factors, AP-42, Volume I, Fifth Edition (AP-42), Chapter 2 – Solid Waste Disposal, Office of Air Quality Planning and Standards Office of Air and Radiation (OAQPS), EPA, Draft October 2008.

**Table 3 PRE-PROJECT POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS <sup>(a)(b)</sup>**

Emission source	PM <sub>2.5</sub> /PM <sub>10</sub>		SO <sub>2</sub>		NO <sub>x</sub>		CO		VOC		NMOC		Lead	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
NW Flare 1.1	0.021	0.094	0.003	0.02	0.055	0.242	0.065	0.29	0.068	0.30	0.068	0.30	0	0
NW Flare 1.2	0.021	0.094	0.003	0.02	0.055	0.242	0.065	0.29	0.068	0.30	0.068	0.30	0	0
NE Flare 1.1	0.021	0.094	0.003	0.02	0.055	0.242	0.065	0.29	0.068	0.30	0.068	0.30	0	0
NE Flare 1.2	0.021	0.094	0.003	0.02	0.055	0.242	0.065	0.29	0.068	0.30	0.068	0.30	0	0
SW Flare 1.1	0.021	0.094	0.003	0.02	0.055	0.242	0.065	0.29	0.068	0.30	0.068	0.30	0	0
SE Flare 1.1	0.021	0.094	0.003	0.02	0.055	0.242	0.065	0.29	0.068	0.30	0.068	0.30	0	0
SE Flare 1.2	0.021	0.094	0.003	0.02	0.055	0.242	0.065	0.29	0.068	0.30	0.068	0.30	0	0
<b>Pre-Project Totals</b>	<b>0.15</b>	<b>0.66</b>	<b>0.02</b>	<b>0.1</b>	<b>0.4</b>	<b>1.7</b>	<b>0.5</b>	<b>2.0</b>	<b>0.5</b>	<b>2.1</b>	<b>0.5</b>	<b>2.10</b>	<b>0.0</b>	<b>0.00</b>

- a) Controlled average emission rates in pounds per hour and tons per year are annual averages, based on maximum projected annual landfill emissions in year 2011 for Cell No. 1.
- b) Emissions from PTC-exempt engines are not included in this table, but are expected to have combined PTE at below regulatory concern (BRC) levels.

### **Post-Project Potential to Emit**

Post-project Potential to Emit is used to establish the change in emissions at a facility and to determine the facility's classification as a result of this project. Post-project Potential to Emit includes all permit limits resulting from this project.

The following table presents the post-project Potential to Emit for criteria pollutants from all emissions units at the facility as determined by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

**Table 4 POST-PROJECT EMISSION INCREASES OF CRITERIA POLLUTANTS <sup>(a)(b)</sup>**

Emission source	PM <sub>2.5</sub> /PM <sub>10</sub>		SO <sub>2</sub>		NO <sub>x</sub>		CO		VOC		NMOC		Lead	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
NW Flare 1.1	0.021	0.094	0.003	0.02	0.055	0.242	0.065	0.29	0.068	0.30	0.068	0.30	0	0
NW Flare 1.2	0.021	0.094	0.003	0.02	0.055	0.242	0.065	0.29	0.068	0.30	0.068	0.30	0	0
NE Flare 1.1	0.021	0.094	0.003	0.02	0.055	0.242	0.065	0.29	0.068	0.30	0.068	0.30	0	0
NE Flare 1.2	0.021	0.094	0.003	0.02	0.055	0.242	0.065	0.29	0.068	0.30	0.068	0.30	0	0
SW Flare 1.1	0.021	0.094	0.003	0.02	0.055	0.242	0.065	0.29	0.068	0.30	0.068	0.30	0	0
SE Flare 1.1	0.021	0.094	0.003	0.02	0.055	0.242	0.065	0.29	0.068	0.30	0.068	0.30	0	0
SE Flare 1.2	0.021	0.094	0.003	0.02	0.055	0.242	0.065	0.29	0.068	0.30	0.068	0.30	0	0
NW Flare 2.1	0.034	0.147	0.004	0.02	0.087	0.382	0.103	0.45	0.107	0.47	0.107	0.47	0	0
NW Flare 2.2	0.034	0.147	0.004	0.02	0.087	0.382	0.103	0.45	0.107	0.47	0.107	0.47	0	0
NW Flare 2.3	0.034	0.147	0.004	0.02	0.087	0.382	0.103	0.45	0.107	0.47	0.107	0.47	0	0
NE Flare 2.1	0.034	0.147	0.004	0.02	0.087	0.382	0.103	0.45	0.107	0.47	0.107	0.47	0	0
NE Flare 2.2	0.034	0.147	0.004	0.02	0.087	0.382	0.103	0.45	0.107	0.47	0.107	0.47	0	0
NE Flare 2.3	0.034	0.147	0.004	0.02	0.087	0.382	0.103	0.45	0.107	0.47	0.107	0.47	0	0
<b>Post-Project Totals</b>	<b>0.35</b>	<b>1.54</b>	<b>0.05</b>	<b>0.3</b>	<b>0.9</b>	<b>4.0</b>	<b>1.1</b>	<b>4.7</b>	<b>1.1</b>	<b>4.9</b>	<b>1.1</b>	<b>4.92</b>	<b>0.0</b>	<b>0.00</b>

- a) Controlled average emission rates in pounds per hour and tons per year are annual averages, based on maximum projected annual landfill emissions in year 2011 for Cell No. 1 and in year 2039 for Cell No. 2.
- b) Emissions from PTC-exempt engines are not included in this table, but are expected to have combined PTE at below regulatory concern (BRC) levels.

### **Change in Potential to Emit**

The change in facility-wide potential to emit is used to determine if a public comment period may be required and to determine the processing fee per IDAPA 58.01.01.225. The following table presents the facility-wide change in the potential to emit for criteria pollutants.



The following table presents the post-project emission increases for all criteria pollutants from Cell No. 2 (and the facility-wide change in the potential to emit for criteria pollutants) as submitted by the applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

**Table 5 CHANGES IN POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS <sup>(a)</sup>**

Emission source	PM <sub>2.5</sub> /PM <sub>10</sub>		SO <sub>2</sub>		NO <sub>x</sub>		CO		VOC		NMOC		Lead	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Pre-Project Potential to Emit	0.15	0.66	0.02	0.1	0.4	1.7	0.5	2.0	0.5	2.1	0.5	2.10	0.0	0.00
Post-Project Potential to Emit	0.35	1.54	0.05	0.3	0.9	4.0	1.1	4.7	1.1	4.9	1.1	4.92	0.0	0.00
<b>Changes in Potential to Emit</b>	<b>0.20</b>	<b>0.88</b>	<b>0.03</b>	<b>0.2</b>	<b>0.5</b>	<b>2.3</b>	<b>0.6</b>	<b>2.7</b>	<b>0.6</b>	<b>2.8</b>	<b>0.6</b>	<b>2.82</b>	<b>0.0</b>	<b>0.00</b>
<b>BRC Thresholds<sup>2</sup></b>		<b>1.0</b>		<b>4.0</b>		<b>4.0</b>		<b>10.0</b>		<b>4.0</b>				<b>0.06</b>

a) Controlled average emission rate in pounds per hour and tons per year are annual averages, based on maximum projected annual landfill emissions in year 2011 for Cell No. 1 and in year 2039 for Cell No. 2.

Criteria pollutants (e.g., PM<sub>2.5</sub>, PM<sub>10</sub>, NO<sub>x</sub>, CO, SO<sub>2</sub>, VOC, and lead) were compared to “below regulatory concern” (BRC) thresholds, defined as 10% of “significant” levels in IDAPA Section 006 in order to determine whether modeling was required, in accordance with DEQ’s BRC “Policy on NAAQS Compliance Demonstration Requirements.”

<sup>2</sup> DEQ “Policy on NAAQS Compliance Demonstration Requirements” (2014ACF3) and IDAPA 58.01.01.210.20, respectively.

### HAP and TAP Emission Increases

A summary of the estimated PTE for project emission increases of hazardous air pollutants (HAP) and toxic air pollutants (TAP) are provided in the following tables.

**Table 6 HAP PTE <sup>(a)</sup>**

HAP	Cell No. 2	Facility-Wide
	PTE (T/yr)	PTE (T/yr)
1,1,1-Trichloroethane (methyl chloroform)	0.02	0.03
1,1,2,2-Tetrachloroethane	0.05	0.07
1,1-Dichloroethane (ethylidene dichloride)	0.07	0.09
1,1-Dichloroethene (vinylidene chloride)	0.01	0.01
1,2-Dichloroethane (ethylene dichloride)	0.02	0.03
1,2-Dichloropropane (propylene dichloride)	0.01	0.01
Acrylonitrile	0.09	0.12
Benzene	0.04	0.05
Carbon disulfide	0.02	0.03
Carbon tetrachloride	0.01	0.01
Carbonyl sulfide	0.01	0.01
Chlorobenzene	0.01	0.01
Chloroethane (ethyl chloride)	0.03	0.04
Chloroform	0.01	0.01
Chloromethane	0.02	0.03
Dichlorobenzene ( for para isomer)	0.01	0.01
Dichloromethane (methylene chloride)	0.31	0.42
Ethylbenzene	0.13	0.17
Ethylene dibromide	0.01	0.01
Hexane	0.15	0.20
Mercury (total)	0.0001	0.0001
Methyl ethyl ketone	0.13	0.17
Methyl isobutyl ketone	0.05	0.07
Perchloroethylene (tetrachloroethylene)	0.16	0.21
Toluene	0.92	1.23
Trichloroethylene (trichloroethene)	0.10	0.13
Vinyl chloride	0.12	0.16
Xylenes	0.33	0.44
<b>Total HAP</b>	<b>2.8</b>	<b>3.75</b>
<b>Maximum Individual HAP</b>	<b>0.9</b>	<b>1.21</b>

- a) Controlled average emission rates in tons per year are annual averages, based on maximum projected annual landfill emissions in year 2011 for Cell No. 1 and in year 2039 for Cell No. 2.
- b) Emissions from PTC-exempt engines are not included in this table.

**Table 7 CELL NO. 2 NON-HAP TAP EMISSION INCREASES**

<b>Non-Carcinogenic Toxic Air Pollutants</b>	<b>Average Emission Rates<sup>(a)</sup> (lb/hr)</b>	<b>Non-Carcinogenic Screening Emission Level (lb/hr)</b>	<b>Exceeds Screening Emissions Level? (Y/N)</b>
Acetone	0.03	119	No
2-Propanol (isopropyl alcohol)	0.18	65.3	No
Hydrogen sulfide	0.07	0.933	No
Dichlorofluoromethane	0.02	2.67	No
Ethanol (ethyl alcohol)	0.07	125	No
Ethyl mercaptan (ethanethiol)	0.01	0.07	No
Methyl mercaptan	0.007	0.033	No
Pentane	0.02	118	No
<b>Carcinogenic Toxic Air Pollutants</b>	<b>Average Emission Rates<sup>(a)</sup> (lb/hr)</b>	<b>Non-Carcinogenic Screening Emission Level (lb/hr)</b>	<b>Exceeds Screening Emissions Level? (Y/N)</b>
1,2-Dichloroethylene	0.02	52.7	No

a) Controlled average emission rates in pounds per hour are annual averages, based on maximum projected annual landfill emissions in year 2011 for Cell No. 1 and in year 2039 for Cell No. 2.

For non-HAP TAP, none of the applicable emission screening levels (EL) were exceeded as a result of this project, and modeling was not required.

### ***Ambient Air Quality Impact Analyses***

The estimated emission rates of PM<sub>2.5</sub>, PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, VOC, and TAP from this project were below applicable screening emission levels (EL) and published DEQ modeling thresholds established in IDAPA 58.01.01.585-586 and in the State of Idaho Air Quality Modeling Guideline.<sup>3</sup> Refer to the Emission Inventories section for additional information concerning the emission inventories.

As described in the MACT/GACT Applicability (40 CFR 63) section, Cell No. 2 is subject to NESHAP Subpart AAAA. Because it is presumed that EPA evaluated the 187 HAPs when developing emission standards for new, modified or existing stationary sources regulated by 40 CFR Part 63 (NESHAP; including sources specifically exempted within the relevant Subpart), no further review was required under IDAPA 58.01.01.210 for TAP that are also HAP.

The applicant has demonstrated pre-construction compliance to DEQ's satisfaction that emissions from this facility will not cause or significantly contribute to a violation of any ambient air quality standard. The applicant has also demonstrated pre-construction compliance to DEQ's satisfaction that the emissions increase due to this permitting action will not exceed any acceptable ambient concentration (AAC) or acceptable ambient concentration for carcinogens (AACC) for toxic air pollutants (TAP).

<sup>3</sup> Criteria pollutant thresholds in Table 2, State of Idaho Guideline for Performing Air Quality Impact Analyses, Doc ID AQ-011, September 2013.

## REGULATORY ANALYSIS

### Attainment Designation (40 CFR 81.313)

Clay Peak is located in Payette County (AQCR 63) which is designated as unclassifiable/attainment for PM<sub>2.5</sub>, PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, and ozone for federal and state criteria air pollutants. Reference 40 CFR 81.313.

### Facility Classification

The AIRS/AFS facility classification codes are as follows:

For HAPs (Hazardous Air Pollutants) Only:

- A = Use when any one HAP has actual or potential emissions  $\geq 10$  T/yr or if the aggregate of all HAPS (Total HAPs) has actual or potential emissions  $\geq 25$  T/yr.
- SM80 = Use if a synthetic minor (potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable limitations) and the permit sets limits  $\geq 8$  T/yr of a single HAP or  $\geq 20$  T/yr of THAP.
- SM = Use if a synthetic minor (potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable limitations) and the potential HAP emissions are limited to  $< 8$  T/yr of a single HAP and/or  $< 20$  T/yr of THAP.
- B = Use when the potential to emit without permit restrictions is below the 10 and 25 T/yr major source threshold
- UNK = Class is unknown

For All Other Pollutants:

- A = Actual or potential emissions of a pollutant are  $\geq 100$  T/yr.
- SM80 = Use if a synthetic minor for the applicable pollutant (potential emissions fall below 100 T/yr if and only if the source complies with federally enforceable limitations) and potential emissions of the pollutant are  $\geq 80$  T/yr.
- SM = Use if a synthetic minor for the applicable pollutant (potential emissions fall below 100 T/yr if and only if the source complies with federally enforceable limitations) and potential emissions of the pollutant are  $< 80$  T/yr.
- B = Actual and potential emissions are  $< 100$  T/yr without permit restrictions.
- UNK = Class is unknown.

Table 8 REGULATED AIR POLLUTANT FACILITY CLASSIFICATION

Pollutant	Uncontrolled PTE (T/yr)	Permitted PTE (T/yr)	Major Source Thresholds (T/yr)	AIRS/AFS Classification
PM	1.54	1.54	100	B
PM <sub>10</sub>	1.54	1.54	100	B
PM <sub>2.5</sub>	1.54	1.54	100	B
SO <sub>2</sub>	0.3	0.3	100	B
NO <sub>x</sub>	4.0	4.0	100	B
CO	4.7	4.7	100	B
VOC	4.9	4.9	100	B
HAP (single)	1.21	1.21	10	B
HAP (total)	3.75	3.75	25	B
Pb	0.00	0.00	100	B

### ***Permit to Construct (IDAPA 58.01.01.201)***

IDAPA 58.01.01.201 ..... Permit to Construct Required

The permittee has requested that a PTC be issued to the facility for the proposed new Cell No. 2 emissions sources. Therefore, a permit to construct is required to be issued in accordance with IDAPA 58.01.01.220. This permitting action was processed in accordance with the procedures of IDAPA 58.01.01.200-228.

### ***Tier II Operating Permit (IDAPA 58.01.01.401)***

IDAPA 58.01.01.401 ..... Tier II Operating Permit

The facility does not have and is not required to have a Tier II permit in accordance with IDAPA 58.01.01.401. Therefore, the requirements of IDAPA 58.01.01.401 were not applicable.

IDAPA 58.01.01.401 ..... Tier II Operating Permit

The application was submitted for a permit to construct (refer to the Permit to Construct section), and an optional Tier II operating permit has not been requested. Therefore, the procedures of IDAPA 58.01.01.400–410 were not applicable to this permitting action.

### ***Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)***

IDAPA 58.01.01.301 ..... Requirement to Obtain Tier I Operating Permit

In accordance with IDAPA 58.01.01.313.01.b and 40 CFR 60.752(b), the permittee must submit a complete application to DEQ for an initial Tier I operating permit within 12 months of becoming a Tier I source subject to 40 CFR 60, Subpart WWW.

Clay Peak has committed to applying for a T1 permit, and to including information concerning PTC-exempt equipment and federal regulatory applicability in the T1 application.<sup>4</sup> Specific federally-applicable requirements will be incorporated into the T1 (refer to NSPS Applicability (40 CFR 60) and MACT/GACT Applicability (40 CFR 63) sections below for additional information regarding applicable requirements).

### ***PSD Classification (40 CFR 52.21)***

40 CFR 52.21 ..... Prevention of Significant Deterioration Of Air Quality

The facility is not a major stationary source as defined in 40 CFR 52.21(b)(1), nor is it undergoing any physical change at a stationary source, not otherwise qualifying under paragraph 40 CFR 52.21(b)(1) as a major stationary source, that would constitute a major stationary source by itself as defined in 40 CFR 52. Therefore, in accordance with 40 CFR 52.21(a)(2), the PSD requirements do not apply.

### ***Rules for Control of Incinerators-Emissions Limits (IDAPA 58.01.01.785)***

IDAPA 58.01.01.785 ..... Rules for Control of Incinerators-Emissions Limits

As detailed in the Statement for the prior permitting action, because the flares are not directly combusting refuse, they do not meet the definition of incinerator in IDAPA 58.01.01.006, and it was determined Section 785 emissions limits are therefore not applicable to the flares.

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<sup>4</sup> “Engineer Responses to DEQ PTC Application Review for Clay Peak Landfill, Payette County, Idaho,” HECO Engineers, March 14, 2018. (2018AAG590)

### ***Rules for the Control of Odors (IDAPA 58.01.01.775-776)***

IDAPA 58.01.01.775-776..... Rules for the Control of Odors

The facility is subject to the general restrictions for the control of odors. This requirement is incorporated as Permit Condition 2.4. Compliance with this limit is assured by complying with odor complaint requirements (Permit Condition 2.7).

### ***NSPS Applicability (40 CFR 60)***

Because the facility has a municipal solid waste landfill that is an area source with a design capacity greater than 2.5 million megagrams, the facility is subject to the following NSPS (incorporated as Permit Condition 2.7):

- 40 CFR 60, Subpart WWW – Standards of Performance for Municipal Solid Waste Landfills. DEQ is delegated this Subpart.

### ***NESHAP Applicability (40 CFR 61)***

The facility is not subject to any NESHAP requirements in 40 CFR 61.

### ***MACT/GACT Applicability (40 CFR 63)***

Because the facility has an active municipal solid waste landfill with a design capacity greater than 2.5 million megagrams, the facility is subject to the following area source NESHAP (incorporated as Permit Condition 2.8):

- 40 CFR 63, Subpart AAAA – National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills. DEQ is delegated this Subpart.

## Permit Conditions Review

This section describes those permit conditions that have been added, revised, or removed as a result of this permitting action. Although explicit emission limits for the proposed flares appeared in draft versions of this permit, DEQ determined that inclusion of these limits in the final permit was unnecessary because such limits were based on emissions estimates which could not readily be verified by source testing, and for which continuous compliance would rely upon requirements for proper operation and maintenance of the control equipment incorporated elsewhere in the permit (Permit Condition 2.4 and General Provision 3.2).

Revised Permit Conditions 1.4, 2.1, and 2.2 (*Permit Conditions 1.4, 2.1, and 2.2 of P-2008.0078 issued 12/16/08*)

Table 1.1 lists all sources of regulated emissions in this PTC.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Controls
2.	<u>LANDFILL GAS FLARE:</u> NW Flare 1.1 - Landfill Services Corp. model CF-5 flares with a heat input rating of 2.160 MMBtu/hr installed in 2001	None (considered an emission control device when combusting landfill gas)
	<u>LANDFILL GAS FLARE:</u> NE Flare 1.1 - Landfill Services Corp. model CF-5 flares with a heat input rating of 2.160 MMBtu/hr installed in 2001	None (considered an emission control device when combusting landfill gas)
	<u>LANDFILL GAS FLARE:</u> NW Flare 1.2 - Landfill Services Corp. model CF-5 flares with a heat input rating of 2.160 MMBtu/hr installed in 2004	None (considered an emission control device when combusting landfill gas)
	<u>LANDFILL GAS FLARE:</u> NE Flare 1.2 - Landfill Services Corp. model CF-5 flares with a heat input rating of 2.160 MMBtu/hr installed in 2005	None (considered an emission control device when combusting landfill gas)
	<u>LANDFILL GAS FLARE:</u> SW Flare 1.1 - Landfill Services Corp. model CF-5 flares with a heat input rating of 2.160 MMBtu/hr installed in 2007	None (considered an emission control device when combusting landfill gas)
	<u>LANDFILL GAS FLARE:</u> SE Flare 1.1 - Landfill Services Corp. model CF-5 flares with a heat input rating of 2.160 MMBtu/hr installed in 2007	None (considered an emission control device when combusting landfill gas)
	<u>LANDFILL GAS FLARE:</u> SE Flare 1.2 - Landfill Services Corp. model CF-5 flares with a heat input rating of 2.160 MMBtu/hr to be installed in 2008	None (considered an emission control device when combusting landfill gas)

Four existing flares and three proposed flares will be used at Clay Peak to combust landfill gas from the gas collection system. The four existing flares are connected to a manifold system which consists of perforated PVC pipes running directly from within landfill Cell No. 1. The flares are passively fed systems located on the periphery of Cell No. 1. The three proposed flares will be connected by a new manifold system to the existing flares. The manifold will service the existing PVC pipes and also the proposed gas collection wells that will be drilled across the north and south faces of Cell No. 1. Cell No. 1 will reach its waste acceptance capacity in 2009 at nearly one million tons of garbage.

Each flare has a solar panel that charges a battery pack. The batteries are used to power an arc which continuously fires at the discharge of the flare. This system ensures that the flares continuously combust the collected landfill gas. The landfill gas flow rates are variable. When there is a sufficient gas flow rate, the arc ignites the gas within the flare.

The landfill gas is composed of approximately 55% methane ( $\text{CH}_4$ ), 40 % carbon dioxide ( $\text{CO}_2$ ), 5% nitrogen ( $\text{N}_2$ ), and a small amount of non-methane organic compounds (NMOC). Within the NMOC are some hazardous air pollutants (HAPs) and toxic air pollutants (TAPs). A trace amount of hydrogen sulfide ( $\text{H}_2\text{S}$ ) gas is also found in the landfill gas.

Particulate matter emissions from the flares are uncontrolled. The NMOC and methane are combusted by the flares at a temperature between 900 – 1,300 °F. The combusted gases have a residence time of 0.6 seconds at low flow and 0.3 seconds at high flow, and the flare achieves a destruction efficiency of greater than 98%.

Table 2.1 SEVEN LANDFILL GAS FLARES DESCRIPTION

<i>Emissions Units/Processes</i>	<i>Emissions Control Device</i>	<i>Emissions Point</i>
<i>Landfill Gas Flare (NW Flare 1.1)</i>	<i>N/A (Note: Is considered an emission control device when combusting biogas)</i>	<i>Exhaust stack NW FLARE 1.1 Exit height: 12.00 ft Exit diameter: N/A Exit flow rate: 30 cfm Exit temperature: 1,832 °F</i>
<i>Landfill Gas Flare (NE Flare 1.1)</i>	<i>N/A (Note: Is considered an emission control device when combusting biogas)</i>	<i>Exhaust stack NE FLARE 1.1 Exit height: 12.00 ft Exit diameter: N/A Exit flow rate: 30 cfm Exit temperature: 1,832 °F</i>
<i>Landfill Gas Flare (NW Flare 1.2)</i>	<i>N/A (Note: Is considered an emission control device when combusting biogas)</i>	<i>Exhaust stack NW FLARE 1.2 Exit height: 12.00 ft Exit diameter: N/A Exit flow rate: 30 cfm Exit temperature: 1,832 °F</i>
<i>Landfill Gas Flare (NE Flare 1.2)</i>	<i>N/A (Note: Is considered an emission control device when combusting biogas)</i>	<i>Exhaust stack NE FLARE 1.2 Exit height: 12.00 ft Exit diameter: N/A Exit flow rate: 30 cfm Exit temperature: 1,832 °F</i>
<i>Landfill Gas Flare (SW Flare 1.1)</i>	<i>N/A (Note: Is considered an emission control device when combusting biogas)</i>	<i>Exhaust stack SW FLARE 1.1 Exit height: 12.00 ft Exit diameter: N/A Exit flow rate: 30 cfm Exit temperature: 1,832 °F</i>
<i>Landfill Gas Flare (SE Flare 1.1)</i>	<i>N/A (Note: Is considered an emission control device when combusting biogas)</i>	<i>Exhaust stack SE FLARE 1.1 Exit height: 12.00 ft Exit diameter: N/A Exit flow rate: 30 cfm Exit temperature: 1,832 °F</i>
<i>Landfill Gas Flare (SE Flare 1.2)</i>	<i>N/A (Note: Is considered an emission control device when combusting biogas)</i>	<i>Exhaust stack SE FLARE 1.2 Exit height: 12.00 ft Exit diameter: N/A Exit flow rate: 30 cfm Exit temperature: 1,832 °F</i>

Process descriptions have been updated to include the proposed flares.

Removed Permit Condition 2.3 of P-2008.0078 issued 12/16/08

*A person shall not discharge any air pollutant into the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.*

Facility-wide and generally-applicable opacity limits that will be incorporated into the required T1 Operating Permit for this landfill and associated generator engines were considered duplicative and have been removed.

Removed Permit Conditions 2.5 and 2.6 of P-2008.0078 issued 12/16/08

*The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.*

*The permittee shall comply with provisions of IDAPA 58.01.01.600-616, Rules for Control of Open Burning.*

Facility-wide and generally-applicable excess emissions and open burning requirements that will be incorporated into the required T1 Operating Permit for this landfill were considered duplicative and have been removed. Excess emissions requirements are also incorporated in General Provision 3.11 of this permit.



Added Permit Conditions 2.7, 2.8, and 2.9

These permit conditions incorporate NSPS and NESHAP requirements in accordance with NSPS Subpart WWW and NESHAP Subpart AAAAA. Applicable emission limits and requirements will be incorporated into the required T1 Operating permit, including applicable requirements for PTC-exempt emergency generator engines.<sup>4</sup>

## **PUBLIC REVIEW**

### ***Public Comment Opportunity***

An opportunity for public comment period on the application was provided in accordance with IDAPA 58.01.01.209.01. During this time, there was a request for a public comment period on DEQ's proposed action. Refer to the chronology for public comment opportunity dates.

### ***Public Comment Period***

A public comment period was made available to the public in accordance with IDAPA 58.01.01.209.01.c. During this time, comments were not submitted in response to DEQ's proposed action. Refer to the chronology for public comment period dates.

## APPENDIX A – EMISSION INVENTORIES

Criteria PTE FOR LANDFILL CELL #2 (2039)					
Pollutant	PM <sub>2.5/10</sub>	NO <sub>x</sub>	SO <sub>x</sub>	CO	NMOC
Each flare (lb/hr)	0.03	0.09	0.00	0.10	0.11
Each Flare (T/yr)	0.15	0.38	0.02	0.45	0.47
Facility (6 flares) (lb/hr)	0.20	0.52	0.03	0.62	0.64
Facility (6 flares) (T/yr)	0.88	2.29	0.12	2.70	2.82
BRC	1.00	4.00	4.00	10.00	4.00
Exceed BRC?	No	No	No	No	No

Source: AP-42, Section 2.4 Municipal Solid Waste Landfills, Revised November  
See Figure 1 for PM<sub>10</sub>, NO<sub>x</sub>, and CO calculations.  
See Figure 2 for SO<sub>x</sub> calculations. See Figure 3 for NMOC calculations.  
NMOC modeled as Hexane with molecular weight 86.18 lb/lbmol.

HAP/TAP PTE FOR LANDFILL	CELL #2 (2039)	CELL #1 (2011)
Toxic Air Pollutant	PTE T/yr	PTE T/yr
1,1,1Trichloroethane (methyl chloroform)	0.02	0.01
1,1,2,2Tetrachloroethane	0.05	0.03
1,1Dichloroethane (ethylene dichloride)	0.07	0.04
1,1Dichloroethene (vinylidene chloride)	0.01	0.01
1,2Dichloroethane (ethylene dichloride)	0.02	0.01
1,2Dichloropropane (propylene dichloride)	0.01	0.01
2Propanol (isopropyl alcohol)	0.77	0.45
Acetone	0.11	0.07
Acrylonitrile	0.09	0.05
Benzene	0.04	0.03
Bromodichloromethane	0.13	0.08
Carbon disulfide	0.02	0.01
Carbon tetrachloride	0.01	0.01
Carbonyl sulfide	0.01	0.01
Chlorobenzene	0.01	0.01
Chlorodifluoromethane	0.03	0.02
Chloroethane (ethyl chloride)	0.03	0.02
Chloroform	0.01	0.01
Chloromethane	0.02	0.01
Dichlorobenzene (for para isomer)	0.01	0.01
Dichlorodifluoromethane	0.50	0.29
Dichlorofluoromethane	0.07	0.04
Dichloromethane (methylene chloride)	0.31	0.18
Dimethyl sulfide (methyl sulfide)	0.13	0.08
Ethanol	0.32	0.19
Ethyl mercaptan (ethanethiol)	0.04	0.03
Ethylbenzene	0.13	0.08
Ethylene dibromide	0.01	0.01
Fluorotrichloromethane	0.03	0.02
Hexane	0.15	0.09
Hydrogen sulfide	0.32	0.19
Mercury (total)	0.0001	0.0001
Methyl ethyl ketone	0.13	0.08
Methyl isobutyl ketone	0.05	0.03
Methyl mercaptan	0.04	0.02
Pentane	0.07	0.04
Perchloroethylene (tetrachloroethylene)	0.16	0.10
Propane	0.13	0.08
1,1,2Dichloroethene	0.07	0.05
Toluene	0.92	0.54
Trichloroethylene (trichloroethene)	0.10	0.06
Vinyl chloride	0.12	0.07
Xylenes	0.33	0.19
Total HAP/TAP	5.60	3.36
Max Individual HAP/TAP	0.92	0.54

From LANDGEM emission inventories for maximum emission years.

## **APPENDIX B – FACILITY DRAFT COMMENTS**

**The following comments were received from the facility on June 22, 2018:**

**Facility Comment #1:**

DEQ accurately reported in Table 1.1 of the PTC that six gas flares are intended to be installed in 2018 through 2020. However, General Provision 3.5 states that gas flare construction must be started within two years of the permit issue date. Therefore, Payette County assumes that DEQ acknowledges the installation of the landfill gas header and manifold complies with this condition, though final gas flare installation may not be completed until after 2020, pending waste volume receipt.

**DEQ Response #1:**

No change has been made to the permit. With regard to General Provision 3.5, DEQ acknowledges that construction of the six flares will be completed in a phased process from 2018 through 2020, which would be taken into account when evaluating compliance with construction deadlines. As long as close communication with the Boise Regional Office is maintained, including providing timely notification of initiation of construction, suspension of construction, and start-up of each flare as required under General Provision 3.6, it is not anticipated that the construction schedule as proposed would be problematic. When requested in advance, extension of such deadlines by DEQ may also be considered when resulting from extenuating circumstances. Again, advance communication with the Boise Regional office is key in such circumstances.

**Facility Comment #2:**

The wood chipper in Table 9 in the Statement of Basis is powered by a diesel engine and not a propane-fueled engine.

**DEQ Response #2:**

Table 9 of the Statement of Basis has been updated as requested.



V# 2018-04140  
TC \$5,000.00  
RECEIVED  
JUN 21 2018  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
STATE AQ PROGRAM

June 20, 2018

Morrie Lewis, Permit Writer  
Air Quality Division  
Idaho Department of Environmental Quality (DEQ)  
1410 North Hilton  
Boise, Idaho 83706-1253

Subject: Payette County Comments on Draft Permit to Construct No. P-2008.0078  
Clay Peak Municipal Solid Waste Facility, Payette County, Payette, Idaho  
DEQ Facility Identification No. 075-00009  
HECO Project No. PC16-0307P

Dear Mr. Lewis;

Having reviewed the Draft Permit to Construct (PTC) and Statement of Basis transmitted to Alan Scharbrough on June 8, 2018, we have only two comments:

- Comment #1: See Draft PTC page 9, Article 3.5: DEQ accurately reported in Table 1.1 in the PTC that six gas flares are intended to be installed in 2018 through 2020. However, Article 3.5 states that gas flare construction must be started within two years of the permit issue date. Therefore, Payette County assumes that DEQ acknowledges the installation of the landfill gas header and manifold complies with this condition, though final gas flare installation may not be completed until after 2020, pending waste volume receipt.
- Comment #2: See Statement of Basis, page 17, Table 9: The wood chipper is powered by a diesel engine and not a propane fueled engine.

Also, enclosed is the PTC processing fee of \$5,000 per your June 8, 2018 request to Alan Scharbrough. Please contact me at 208.642.3304 or [basilt@hecoengineers.com](mailto:basilt@hecoengineers.com) if you have questions.

Sincerely,

HECO Engineers  
Basil Tupy, P.E.

Cc: The Honorable Georgia Hanigan, Chairman of Payette County Commissioners  
Alan Scharbrough, Landfill Director

Please make checks payable to: Department of Environmental Quality. Please write your permit number on the check and remit the fee and this information to the following:

Idaho Department of Environmental Quality  
Fiscal Office – Air Quality  
1410 N. Hilton, Boise, ID 83706-1255

Amount Enclosed: \$ 5,000.00

Check No.: 2018-04140

<b>DEPARTMENT USE ONLY:</b>			
<b>Facility:</b>	Clay Peak Municipal Solid Waste Landfill	<b>Facility ID:</b>	075-00009
<b>Project</b>	Addition of six landfill gas flares	<b>Permit No.:</b>	P-2008.0078 PROJ 61969
<b>Fee Type</b>	PTC Processing Fee	<b>Fee Amount</b>	\$ 5,000.00
<b>Routing Instructions: Copy Air Program upon receipt of fee.</b>			

## **APPENDIX C – PROCESSING FEE**



## PTC Processing Fee Calculation Worksheet

**Instructions:**

Fill in the following information and answer the following questions with a Y or N. Enter the emissions increases and decreases for each pollutant in the table.

Company: Clay Peak MSW Landfill  
 Address: 2560 Highway 52  
 City: Payette  
 State: ID  
 Zip Code: 83661  
 Facility Contact: Alan Scharbrough  
 Title: Landfill Supervisor  
 AIRS No.: 075-00009

- ☐ N Does this facility qualify for a general permit (i.e. concrete batch plant, hot-mix asphalt plant)? Y/N
- ☐ Y Did this permit require engineering analysis? Y/N
- ☐ N Is this a PSD permit Y/N (IDAPA 58.01.01.205.04)

Emissions Inventory			
Pollutant	Annual Emissions Increase (T/yr)	Annual Emissions Reduction (T/yr)	Annual Emissions Change (T/yr)
NO <sub>x</sub>	2.3	0	2.3
SO <sub>2</sub>	0.2	0	0.2
CO	2.8	0	2.8
PM10	0.9	0	0.9
VOC	2.9	0	2.9
TAPS/HAPS	5.7	0	5.7
Total:	14.8	0	14.8
Fee Due	\$ 5,000.00		

Comments: Based on projected maximum potential emissions from 6 proposed flares at Cell #2 in 2039 (year projected to have maximum emissions).